

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Paul Douglas Scolardi,

Debtor.

Chapter 13
Bky. No: 10-48719 KHS

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

COMES NOW the debtor, Paul Douglas Scolardi, and states:

1. The Trustee has brought a Motion to Dismiss this case (DOC 40) for failure to make plan payments. The debtor did not make the payments as stated in the Trustee's motion.
2. By letter from the Trustee's office dated June 6, 2014, the Debtor was informed that in order to completely pay-off his plan and obtain a discharge he would need to pay to the trustee the amount of \$114,320.74.
3. The Debtor has the funds to pay off his plan.
4. On July 28, 2014, the Debtor intends to place into the United States Mail, first class postage prepaid, an envelope addressed to Gregory A. Burrell, Trustee, PO Box 860026, Minneapolis, MN 55486-0026 which contains a certified check payable to Gregory A. Burrell, Trustee, in the amount of \$114,320.74 for the purpose of paying off the plan and obtaining his discharge.

The Debtor respectfully requests that the Trustee's Motion to Dismiss be denied.

Dated: July 24, 2014

WENTZELL LAW OFFICE, PLLC

/e/ Joseph A. Wentzell

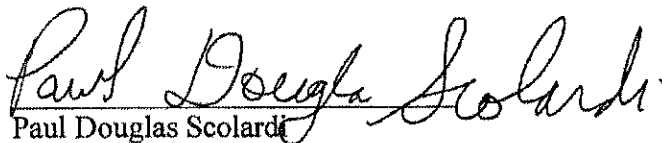
Joseph A. Wentzell 170616
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Email: Jwentzell@fosterbrever.com

ATTORNEY FOR DEBTORS

VERIFICATION

I, Paul Douglas Scolardi, named in the foregoing Response to Trustee's Motion to Dismiss declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: July 24, 2014


Paul Douglas Scolardi

UNITED STATES BANKRUPTCY COURT
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Unsworn Certificate of Service

I hereby certify that on July 25, 2014 I caused the following documents:

1. Debtor's Response to Trustee's Motion to Dismiss
2. Unsworn Certificate of Service

to be filed electronically with the Clerk of Court through ECF.

Dated: July 25, 2014

/s/ James Moen
James Moen
2812 Anthony Lane South, Suite 200
St. Anthony, MN 55418
612.436.3299